

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DAVID ANDREW BERO,

Plaintiff,

vs.

**EQUIFAX INFORMATION
SERVICES, LLC; and
LEXISNEXIS RISK SOLUTIONS**

Defendants.

Civil Action No.:

1:23-cv-02390-AT-JKL

JOINT MOTION TO EXTEND DEADLINE FOR 26(f) CONFERENCE

Plaintiff David Andrew Bero (“Plaintiff”) and Defendant LexisNexis Risk Solutions move this Court to extend the deadline for the 26(f) Conference for 45 days, and in support thereof, Plaintiff states as follows:

1. On May 30, 2023, Plaintiff David Andrew Bero filed the complaint in this matter. (Doc. 1)
2. On August 25, 2023, Defendant LexisNexis Risk Solutions responded to the complaint. (Doc. 7)

3. Defendant Equifax executed a waiver of service and has until October 16, 2023 to respond. (Doc. 6)

4. Defendant Equifax has yet to respond to the said complaint.

5. Plaintiff and Defendant LexisNexis Risk Solutions agree that extending the deadline for the 26(f) Conference is warranted.

6. In light of the above, the Parties will require additional time to conduct the 26(f) Conference.

7. This is the first request for extending the time to conduct the 26(f) Conference.

8. This Motion is not filed for any improper purpose and is not requested for purposes of delay. Further, neither party will be prejudiced by an extension of the deadline for the 26(f) Conference.

WHEREFORE, Plaintiff and Defendants respectfully request that this Motion be granted, and the Court issue an Order extending the deadline for the 26(f) Conference to October 25, 2023.

Respectfully submitted this 12th day of September 2023.

/s/ Joseph P. McClelland

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LexisNexis Risk Solutions

LOCAL RULE 5.1 CERTIFICATION

I hereby certify that Plaintiff's Motion to extend the deadline for the 26(f) Conference has been prepared in Times New Roman 14-point font in accordance with Local Rule 5.1.

Respectfully submitted this 12th day of September 2023.

/s/ Joseph P. McClelland
Joseph P. McClelland, LLC

CERTIFICATION OF SERVICE

I hereby certify that on 11th day of September 2023 the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Respectfully submitted this 12th day of September 2023.

/s/ Joseph P. McClelland
Joseph P. McClelland, LLC